

EXHIBIT N

Vladimir Iakovlev, M.D.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF VIRGINIA
AT CHARLESTON

***** Master File No.
IN RE: 2:12-MD-02327
ETHICON, INC., PELVIC REPAIR MDL 2327
SYSTEM PRODUCTS LIABILITY
LITIGATION JOSEPH R. GOODWIN
US District Judge

TONYA EDWARDS, ET AL,
Plaintiffs, Case No.
v. 2:12-CV-09972
ETHICON, INC., ET AL,
Defendants.

JO HUSKEY AND ALLAN HUSKEY,
Plaintiffs, Case No.
v. 2:12-CV-05201
ETHICON, INC., ET AL,
Defendants.

DEPOSITION OF VLADIMIR IAKOVLEV, M.D.

Tuesday, March 18th, 2014
8:14 a.m.

Held At:
Hampton Inn Boston Logan Airport
230 Lee Burbank Highway
Revere, Massachusetts

REPORTED BY:
Maureen O'Connor Pollard, RMR, CLR, CSR

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1 sectioned in the path report, pathology reports.
2 When they do it, the record all these
3 procedures.

4 Q. Which pathology report are you
5 referencing; yours?

6 A. Mine.

7 Q. Did you bring your pathology report
8 here today?

9 A. I thought it was provided to you.

10 Q. I don't have a pathology report from
11 you.

12 A. I didn't bring it today.

13 Q. Just so I understand, after you do
14 your stiffness and physical analysis, what
15 happens from that point until when you section
16 it?

17 A. Nothing. I take it out, palpate it,
18 examine for whatever is inside, into the mesh,
19 if there is any nodule, tumor, mass,
20 hemorrhagic, describe the characteristics sort
21 of. And then I decide what is the best way to
22 section to examine for specific questions.

23 So for mesh, my initial thoughts were
24 imbedding it perpendicular on the edge might be
25 the best way of doing it. Now I think flat

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1 gives you large area for its clinical features.
2 So it's a judgment call for pathologists.

3 And then the entire specimen is just
4 put in the cassette, or it's being sectioned and
5 then pieces are put in the cassette, and then
6 the cassette goes into the machine for
7 processing.

8 Q. How is the specimen processed?

9 A. Specimen processing is when specimen
10 is gradually dehydrated and then saturated by
11 softened blocks, or paraffin.

12 Q. Were you the one who does the gradual
13 dehydration of Mrs. Edwards' mesh?

14 A. No. It's done by a machine in the
15 lab. There is a processing machine.

16 Q. What machine is that?

17 A. You mean model?

18 Q. If you know.

19 A. I don't know. I mean it's a standard
20 machine. We have several machines.

21 Q. Do you know what the steps are in the
22 dehydration process that you subjected
23 Mrs. Edwards' explant to?

24 A. What usually is done -- not usually.
25 What is done by standard operating procedure, it

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1 goes through several solutions of formalin, so
2 first formalin circulates in the machine, then
3 this formalin is being replaced by solution of
4 an alcohol, gradually becomes 100 percent
5 alcohol. The alcohol is a soluble substance,
6 but is not exactly water. So at that stage the
7 specimen tissue becomes dehydrated, but still
8 immersed in fluid. And then alcohol is being
9 replaced by xylene again in several solutions,
10 because xylene is a solvent for paraffin. Then
11 when tissue is fully saturated by xylene,
12 paraffin can saturate it together with xylene.

13 And then the cassettes are being taken
14 out, and then tissue is put in the cassettes for
15 paraffin blocks. Not in the cassettes, in the
16 bowls, the paraffin blocks. It's a routine
17 protocol that's been in use for over 100 years.

18 Q. Do you have a written protocol for how
19 Mrs. Edwards' mesh was processed and dehydrated?

20 A. There is a standard operating
21 procedure. It was done by standard operating
22 procedure. Not just Mrs. Edwards specimen, any
23 specimen is processed by these procedures.

24 Q. All of the litigation transvaginal
25 mesh specimens that you analyzed went through

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1 this same standard operating procedure to
2 gradually dehydrate the explant before putting
3 it into paraffin?

4 A. Yes. Not just explanted meshes. I
5 also did the same procedure for new mesh.

6 Q. Okay. Now, the alcohol solution is
7 ultimately increased up to 100 percent?

8 A. Yes.

9 Q. Okay. And during the dehydration
10 process, you testified that the alcohol is then
11 replaced by xylene?

12 A. Yes.

13 Q. What is xylene?

14 A. It's a solvent.

15 Q. I'm not a chemist, I'm sorry.

16 A. It's a solvent. I mean it's like any
17 solvent, chemical -- organic chemical solvent.

18 Q. Does the solvent dry out the tissue?

19 A. It's already dry. Dehydration. If
20 you mean drying as in dehydration, it's already
21 dehydrated. It is fluid, it's liquid, but it's
22 not water.

23 Q. What was the concentrations of the
24 xylene that were used in the process to prepare
25 Mrs. Edwards' mesh explant?

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1 COMMONWEALTH OF MASSACHUSETTS)

2 SUFFOLK, SS.)

3 I, MAUREEN O'CONNOR POLLARD, RMR, CLR,
4 and Notary Public in and for the Commonwealth of
5 Massachusetts, do certify that on the 18th day
6 of March, 2014, at 8:14 o'clock, the person
7 above-named was duly sworn to testify to the
8 truth of their knowledge, and examined, and such
9 examination reduced to typewriting under my
10 direction, and is a true record of the testimony
11 given by the witness. I further certify that I
12 am neither attorney, related or employed by any
13 of the parties to this action, and that I am not
14 a relative or employee of any attorney employed
15 by the parties hereto, or financially interested
16 in the action.

17 In witness whereof, I have hereunto
18 set my hand this 30th day of March, 2014.

19

20



21 MAUREEN O'CONNOR POLLARD, NOTARY PUBLIC

22 Realtime Systems Administrator

23 CSR #149108

24

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